

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HANGZHOU CHIC INTELLIGENT)	
TECHNOLOGY CO., LTD. and UNICORN)	
GLOBAL, INC.,)	
)	
Plaintiffs,)	Case No.: 20-cv-4806
)	
v.)	Judge Thomas M. Durkin
)	Magistrate Judge Jeffrey Cole
THE PARTNERSHIPS AND)	
UNINCORPORATED ASSOCIATIONS)	
IDENTIFIED ON SCHEDULE A,)	
)	
Defendants.)	
)	

DECLARATION OF ARTHUR TAN-CHI YUAN IN SUPPORT OF PLAINTIFFS’
REPLY MEMORANDUM IN SUPPORT OF PLAINTIFFS’
MOTION FOR AN ORDER TO SHOW CAUSE

I, Arthur Tan-Chi Yuan, declare as follows:

1. I am one of the attorneys for Plaintiffs Hangzhou Chic Intelligent Technology Co. and Unicorn Global, Inc. and am an attorney licensed in Illinois.
2. I have personally reviewed all materials provided in the attached Exhibits and have firsthand knowledge of the statements below. If called as a witness, I could and would testify to the statements made herein.
3. On July 23, 2021, this Court ordered that “all matters in this case are stayed, except for enforcement of orders already in place....” Dkt. 347. A status hearing was scheduled for August 4, 2021 by the same order (*Id.*), but was later rescheduled to August 9, 2021. Dkt. 349.

4. Between July 23, 2021 and August 9, 2021, Plaintiffs continued to identify infringing activities.

5. The following table illustrates in chronological order the instances of infringing sales on various websites and Amazon.com storefronts identified by Plaintiffs during this period (with “*” denoting new stores created):

Date	Exhibit Number	at least one name of the Store or Website	At least one ASIN found
7/22	Exhibit 1	Gyroor US; zhipeng-us;	B07C3C861F; B07S4KXRQR;
7/23	Exhibit 2	gyroorboard.com Runchenyun; zhipeng-us; Gyroor.com	(no ASIN on the website); B08HW9TTBG; B07S4KXRQR; B08HW9TTBG; (no ASIN on the website);
7/25	Exhibit 3	gyroorboard.com; Gyroor.com; Runchenyun; zhipeng-us; Gyroor storefront on Amazon.com	(no ASIN on the website); (no ASIN on the website); B08HW9TTBG; B07S4KXRQR; B08RYMXRWM; at least the ASINs above;
7/26	Exhibit 4	guanjiacheng-us; Runchenyun; zhipeng-us; Gyroor storefront on Amazon.com	B08HW9TTBG; B08HW9TTBG; B07S4KXRQR; B08RYMXRWM; at least the ASINs above;
7/27	Exhibit 5	Runchenyun; runjinjia-us* Gyroor storefront on Amazon.com; gyroorboard.com	B08HW9TTBG; B07C3C861F; B08HW9TTBG; B07S4KXRQR; B08RYMXRWM; at least the ASINs above; (no ASIN on the website);
7/28	Exhibit 6	gyroorboard.com; Gyroor.com; Runchenyun; Gyroor storefront on Amazon.com;	(no ASIN on the website); (no ASIN on the website); B08HW9TTBG; at least the ASINs above;

7/30	Exhibit 7	runjinjia-us; lanchisi-us*; meidajng-us*;	B08HW9TTBG; B07S4KXRQR; B08RYMXRWM; B099SB6BMZ; B099SB6BMZ; B08RYMXRWM; B099SB6BMZ; B08RYMXRWM;
7/31	Exhibit 8	gyroorboard.com; Gyroor.com; runjinjia-us	(no ASIN on the website); (no ASIN on the website); B07S4KXRQR;
8/2	Exhibit 9	Runchenyun;	B08HW9TTBG;
8/3	Exhibit 10	Gyroor US; runjinjia-us; Jiangyou-us; Gyroor storefront on Amazon.com; Gyroorboard.com; Gyroor.com	B07C3C861F; B07C3C861F; B08HW9TTBG; B07S4KXRQR; B08RYMXRWM; B07C3C861F; at least the ASINs above; (no ASIN on the website); (no ASIN on the website);
8/4	Exhibit 11	Gyroor US; runjinjia-us; Jiangyou-us; Gyroorboard.com; Gyroor.com; Runchenyun; lanchisi-us	B07C3C861F; B07C3C861F; B07C3C861F; (no ASIN on the website); (no ASIN on the website); B08HW9TTBG; B08RYMXRWM;
8/6	Exhibit 12	Gyroor US; Gyroorboard.com; Gyroor.com	B07C3C861F; (no ASIN on the website); (no ASIN on the website);
8/9	Exhibit 13	Gyroor US; Gyroor.com; Gyroorboard.com; Runchenyun	B07C3C861F; (no ASIN on the website); (no ASIN on the website); B08HW9TTBG

6. Each of the Exhibits above is either a true and accurate reproduction of a web capture showing at least one product listing offered for sale by the named store on Amazon.com, or is a true and accurate reproduction of a web capture from the respective website.

7. Further, even as of August 24, 2021, Urbanmax's Facebook "About" page continues to show that it is a Gyroor Sister Brand: "Gyroor Sister Brand: Urbanmax". Exhibit 14 is a true and accurate reproduction of a web capture from the website facebook.com.

8. Moreover, gyroorboard.com and gyroor.com are related to one another. As previously discussed, Plaintiffs placed an order with gyroorboard.com, but the purchase confirmation email was sent from service@gyroor.com, which is the same email address listed on the "Contact Us" page for gyroor.com. Dkt. 327-1, Exhibit 5.

9. Furthermore, gyroorboard.com is related to Gyroor's Amazon store because the contact email address for that storefront is "support@gyroorboard.com."

10. Further, the registrant of the U.S. trademark "GYROOR" (registration number 5121077) is Shenzhen Chitado Technology Co., Ltd., whose registered address with the USPTO is "Floor 3 building D, Fuqian Road Guanlan town, Longhua district, Shenzhen Guangdong China". Exhibit 15 is a true and accurate reproduction of trademark registration certificate of GYROOR.

11. The manufacturer name and address in ¶ 10 is identical to the manufacturer listed on the "About Gyroor" page for gyroorboard.com. Exhibit 16 is a true and accurate copy of gyroorboard.com's "About Us" page.

12. On February 11, 2021, former counsel for Gyroor-US, Danielle McKinley, informed Plaintiffs that "Chitado's [the manufacturer of Gyroor products identified in ¶ 10] Paypal accounts appears to now also be involved: dianxuan2622@163.com. According to them,

this account is not linked to an Amazon store, but is linked to Gyroor's own website – <https://gyoorboard.com>.” Exhibit 17 is a true and accurate copy of this correspondence.

13. The registrant of the US trademark “GYROSHOES” (registration number 5881397) is Shenzhen Chitado Technology Co., Ltd., whose registered address with the USPTO is “First bldg of No.1800112, Dafu Ind. Area FuKeng Community, Guanlan Town, Longhua dist., Shenzhen China 518110”. Exhibit 18 is a true and accurate reproduction of trademark registration certificate of GYROSHOES.

14. The address in ¶ 12 is identical to the address listed on Gyroor's Amazon.com store. Exhibit 19 is a true and accurate reproduction of web capture that identifies the merchant information on Amazon.com.

15. Moreover, Amazon.com's fee schedule indicates that the monthly fee for a professional selling plan is \$39.99 per month. Exhibit 20 is a true and accurate reproduction of web capture from Amazon.com.

16. Exhibit 20 also shows that Amazon's inventory storage fee is no more than \$0.75 per cubic foot, per month, between the months of January and September.

17. Amazon provides brand owners, such as Gyroor-US, a mechanism by which to report unauthorized sellers and take down infringing products listed under the brand owner's ASIN. Exhibit 21 is a true and correct copy of Amazon's “Intellectual Property for Rights Owners” policy.

I declare under penalty of perjury that the foregoing is a true and correct.

Executed on August 24, 2021, Chicago, IL.

/s/ Arthur Tan-Chi Yuan
Arthur T. Yuan.